

Mandatory Adherence To Industry-Adopted Air Interface Standards. Motorola and TIA urge the Commission to require compliance with an ANSI-accredited industry-standard common air interface as a condition precedent to equipment type acceptance. MCI urges the Commission to reject these proposals.

No industry standard common air interface exists today. If compliance with an industry standard were required before PCS transmitters could be placed in service, potential PCS licensees would face the prospect of substantial post-auction delays while ANSI-accredited industry bodies, such as TIA (which are dominated by incumbent licensees and major equipment manufacturers, and which develop standards through a consensus process) complete their deliberations.

If these proposals were adopted, potential PCS service providers willing to implement technologies that might not conform to "accepted industry norms" as reflected in a consensus standard would have their freedom of choice limited by incumbents, major manufacturers and their competitors. The effect would be not only a significant delay in the initial deployment of PCS, but also a potential inhibition of technological advances which would enable licensees to deliver a broad and flexible range of personal communications services to the public.

MCI is willing to continue to participate in the development of voluntary industry standards.<sup>41/</sup> At the same time, MCI intends to move forward with its recently announced

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<sup>41/</sup> In a recent full-page advertisement ("Can your voice be heard over the clatter and commotion of Washington, D.C.?"), TIA described itself as "accredited by ANSI to develop voluntary industry standards for a wide variety of telecommunications products." TE&M, December 15, 1993 at 45, emphasis supplied.

technology alliance with equipment manufacturers and MIT Lincoln Laboratories, established for the purpose of adapting the international GSM standard for the North American market. As previously announced, MCI is willing to make the results of these efforts to create a GSM-based "open platform" available to all. Accordingly, MCI supports the Commission's "hands-off" approach to the PCS standards issue and urges rejection of the Motorola and TIA petitions insofar as they urge the Commission to make compliance with "voluntary" industry standards mandatory for PCS providers.

Base Station Position Location. APC and Telocator urge the Commission to reconsider the requirement that latitude, longitude and elevation of licensed PCS facilities be specified within  $\pm 5$  meters. MCI supports reconsideration of this requirement. Even if it were practicable to achieve this level of accuracy in specifying the location of PCS facilities, there is no reason to impose such a burden solely upon PCS facilities.

Interconnection to 911 Systems and Location Information Delivery. The Texas Attorney General asks the Commission to establish technical and operational requirements applicable to PCS system interconnection with 911 systems and the transmission of location information. MCI supports the Commission's determination to initiate a separate rulemaking "to address E-911 and related issues with regard to PCS, cellular, and any other relevant mobile service." Order at ¶ 139. There is no reason to single out PCS, among all mobile services, for unique treatment. Standardization of interfaces to 911 systems and mandatory transmission of position location for emergency purposes should be developed in a manner that does not delay the deployment of PCS or increase the already substantial cost of PCS deployment.

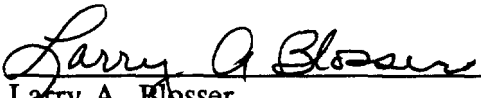
Licensee Use of the Unlicensed PCS Band. AT&T requests that the Commission clarify that "radio common carriers" may not use the unlicensed band to provide services. Citing the anticipated high demand for cordless telephones and wireless PBXs, AT&T asks the Commission to clarify that the allocation of spectrum for such devices "does not present an opportunity for common carrier radio services to avoid competitive bidding and exploit the band cleared for unlicensed devices." (AT&T Petition at 9). Although AT&T's petition does not detail the precise method or methods a PCS licensee might employ to "exploit" the unlicensed band to obtain free spectrum, the potential to engage in "poaching" may well exist. If so, AT&T — which is a major manufacturer and vendor of cordless phones, wireless PBXs and other unlicensed devices, and which also expects to acquire McCaw, the largest single provider of "radio common carrier services" and offer its services under the AT&T brand name — may be best positioned to engage in such activities to the detriment of its competitors. Merely establishing a boundary between licensed and unlicensed spectrum and prohibiting incursions may not afford timely and adequate protection to competition in either market. MCI does not object to AT&T's request for clarification on this issue, but MCI submits that adequate and enforceable safeguards must be adopted if the Commission is to implement such a limitation.

III. CONCLUSION

WHEREFORE, MCI requests that the Commission, upon reconsideration, revise its PCS rules in accordance with the recommendations contained herein and in MCI's Petition for Partial Reconsideration and Clarification.

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CERTIFICATE OF SERVICE

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